

# EXHIBIT 295

STACEY E. PLASKETT Confidential  
GOV. OF U.S. vs JPMORGAN CHASE BANK

May 09, 2023

1

1  
2                   UNITED STATES DISTRICT COURT FOR THE  
3                   SOUTHERN DISTRICT OF NEW YORK

4 -----  
5 GOVERNMENT OF THE UNITED  
6 STATES OF AMERICA,

7                   Plaintiff,

8                   v                                                          Case No. 1:22-cv-10904-UA  
9                   JPMORGAN CHASE BANK, N.A.,

10                   Defendant,  
11 -----  
12  
13

14                   CONFIDENTIAL

15                   VIDEOTAPED DEPOSITION OF

16                   STACEY E. PLASKETT

17                   Tuesday, May 9, 2023

18                   9:00 a.m. EST

19  
20  
21  
22  
23  
24                   Reported by: Goldy Gold, RPR

25                   Job No. J9647388

STACEY E. PLASKETT Confidential  
GOV. OF U.S. vs JPMORGAN CHASE BANK

May 09, 2023

40

1	STACEY PLASKETT - CONFIDENTIAL	
2	a letter like this on behalf of any Epstein	09:59
3	entity that was written not by the Palm Beach	09:59
4	Bank, but by JPMorgan?	10:00
5	A. I don't recall.	10:00
6	Q. Do you remember in or about 2019 an	10:00
7	application being submitted to extend the tax	10:00
8	benefits for the Financial Trust Company?	10:00
9	A. I do not recall.	10:00
10	MR. NEIMAN: Let me show you some	10:00
11	things and see if these help you refresh	
12	your recollection about it.	
13	Let's start with the document I'll ask you	10:00
14	to mark -- I'll ask the reporter to mark	10:00
15	as Plaskett Exhibit 2.	10:00
16	[Exhibit 2, transcript of an	10:00
17	economic development meeting, Bates 202,	10:04
18	was marked for identification.]	10:01
19	BY MR. NEIMAN:	10:01
20	Q. Let me ask you, Congresswoman, if	10:01
21	you recognize Plaskett Exhibit 2?	10:01
22	All right. Let me just repeat my	10:04
23	question. It looks like you've had a chance to	10:04
24	read through the document. Do you recognize	10:04
25	this?	10:04

STACEY E. PLASKETT Confidential  
GOV. OF U.S. vs JPMORGAN CHASE BANK

May 09, 2023

41

1 STACEY PLASKETT - CONFIDENTIAL

2 A. It appears to be a transcript of an 10:04  
3 economic development meeting. 10:04

4 Q. All right. And you can see that 10:04  
5 there's a list of who was present, and one of the 10:04  
6 people who's identified as being present is you, 10:04  
7 right? 10:04

8 A. Correct. 10:04

9 Q. Do you have any memory of this 10:04  
10 meeting, having had a chance to take a look 10:04  
11 the -- 10:04

12 A. No. 10:04

13 Q. Okay. Let's take a look at the -- 10:04  
14 at the people who are present here, just for a 10:04  
15 moment, on the first page of the document. You 10:04  
16 can see that there's a reference to somebody 10:04  
17 named Albert Bryan, Jr., Chairman. 10:05

18 Is that the same Albert Bryan who is 10:05  
19 now the governor of the Virgin Islands? 10:05

20 (Reporter admonition.)

21 BY MR. NEIMAN:

22 Q. Is that the same Albert Bryan who is 10:05  
23 now the governor of the Virgin Islands?

24 A. Yes. 10:05

25 Q. And then the next person below that 10:05